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Attorneys for Plaintiff JENS ERIK SORENSEN,  
as Trustee of SORENSEN RESEARCH AND  
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

JENS ERIK SORENSEN, as Trustee of	)	Case No. CV 07-05568 JSW
SORENSEN RESEARCH AND	)	
DEVELOPMENT TRUST,	)	<b>NOTICE OF MOTION AND</b>
	)	<b>MOTION FOR PARTIAL LIFT OF</b>
Plaintiff	)	<b>STAY AS TO DEFENDANT</b>
v.	)	<b>LEGACY SUPPORT SERVICES</b>
	)	<b>FOR PURPOSES OF ENTERING</b>
DIGITAL NETWORKS NORTH	)	<b>DEFAULT</b>
AMERICA, INC., a Delaware	)	
corporation; LEGACY SUPPORT	)	Date: June 13, 2008
SERVICES, LTD. d/b/a S2G; and DOES	)	Time: 9:00 a.m.
1-100,	)	Courtroom 2, 17 <sup>th</sup> Floor
	)	Judge: Hon. Jeffrey S. White
Defendants.	)	

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2 TO THE ABOVE-ENTITLED COURT AND DEFENDANTS DIGITAL  
3 NETWORKS NORTH AMERICA, INC., a Delaware Corporation, LEGACY  
4 SUPPORT SERVICES, LTD, d/b/a S2G and DOES 1-100:

5 NOTICE is hereby given that on June 13, 2008 at 9:00 a.m., Plaintiff will and  
6 hereby does move this Court for an order for partial lift of stay of proceedings in this  
7 case issued on January 16, 2008 as to Defendant Legacy Services for the purpose of  
8 entering default and obtaining default Judgment. This motion is based upon  
9 Plaintiff's Memorandum of Points and Authorities, and the case file.

10  
11 DATED this 15th day of April, 2008.

12  
13 JENS ERIK SORENSEN, as Trustee of  
14 SORENSEN RESEARCH AND DEVELOPMENT  
15 TRUST, Plaintiff

16  
17 /s/ Melody A. Kramer

18 J. Michael Kaler, Esq.

19 Melody A. Kramer, Esq.

20 Attorneys for Plaintiff  
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**PROOF OF SERVICE**

I, Melody A. Kramer declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On April 15, 2008, I served on the parties to this action the following documents:

**NOTICE OF MOTION AND MOTION FOR PARTIAL LIFT OF STAY AS TO  
DEFENDANT LEGACY SUPPORT SERVICES FOR PURPOSES OF ENTERING  
DEFAULT**

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL LIFT OF STAY AS TO DEFENDANT  
LEGACY SUPPORT SERVICES FOR PURPOSES OF ENTERING DEFAULT**

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PARTIAL  
LIFT OF STAY AS TO DEFENDANT LEGACY SUPPORT SERVICES FOR  
PURPOSES OF ENTERING DEFAULT**

<b>PERSON(S) SERVED</b>	<b>PARTY(IES) SERVED</b>	<b>METHOD OF SERVICE</b>
David A. Jakopin Theodore K. Bell tad.bell@pillsburylaw.com Daniel J. Richert Pillsbury Winthrop et al 2475 Hanover Street Palo Alto, CA 94304-1114 650-233-4545 FAX	Defendant Digital Networks North America, Inc.	Email – Pleadings Filed with the Court
Bradley J. Hulbert hulbert@mbhb.com Richard A. Machonkin machonkin@mbhb.com Kurt W. Rohde rohdek@mbhb.com 300 South Wacker Drive Chicago, IL 60606	Defendant Digital Networks North America, Inc.	Email – Pleadings Filed with the Court

Legacy Support Services, LTD. C/o Registered Agent for Service of Process Mr. Richard Downs 300 S. 13 <sup>th</sup> Street Waco, TX 76701	Legacy Support Services, LTD.	Federal Express
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- ☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
- ☒ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.
- ☐ (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.
- ☐ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.
- ☒ (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

I declare that the foregoing is true and correct, and that this declaration was executed on Tuesday, April 15, 2008, in San Diego, California.

/s/ Melody A. Kramer

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Melody A. Kramer